

The Honorable Robert S. Lasnik

UNITED STATES FEDERAL DISTRICT COURT WESTERN DISTRICT OF
WASHINGTON

JAMES WILLETT, an individual,

Plaintiff,

vs.

VELOCITY ON-SITE, LLC, a Missouri limited
liability company; and CHARLES RAMSEY
aka CHARLES R. RAMSEY II, a married man,

Defendants.

NO. 2:17-CV-01239-RSL

~~PROPOSED~~ STIPULATED ORDER
GRANTING STIPULATED MOTION TO
ADD ADDITIONAL PARTY AND FOR
STIPULATED JUDGMENT

All parties, consisting of Plaintiff, **James Willett**, and the Defendants, **Velocity On-Site, LLC**, a Missouri limited liability company; and **Charles Ramsey aka Charles R. Ramsey II**, a married man, via their Stipulated Motion to Add Additional Party and for Stipulated Judgment ("Motion") stipulate to the entry of this Stipulated Order for Granting Stipulated Motion to Add Additional Party and for Stipulated Judgment ("Order"), without trial or final adjudication of any issue of fact or law, in order to resolve all matters in dispute in this action by Plaintiff.

THEREFORE, IT IS SO ORDERED, ADJUDGED AND DECREED as follows:

~~PROPOSED~~ STIPULATED ORDER GRANTING
STIPULATED MOTION TO ADD ADDITIONAL PARTY
AND FOR STIPULATED JUDGMENT - 1

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FINDINGS OF FACT AND CONCLUSIONS OF LAW

1
2 1. There being no objection, the Court finds that it has jurisdiction over this
3 matter, and further finds that it has jurisdiction and authority to add Velocity Insight, LLC
4 as an additional party and Defendant, to this action.
5

6 2. Velocity Insight, LLC has consented to the Motion.

7 3. Velocity Insight, LLC is hereby added as an additional party and Defendant,
8 to this action, and the clerk of the Court shall amend the caption accordingly.
9

10 4. Per the Stipulated Judgment Velocity Insight, LLC waives any service of
11 process of the original pleadings in this matter and no amended pleadings are required to be
12 made or served on the Defendants.
13

14 5. The Settlement Agreement between the parties is attached as Exhibit 1 to
15 this Order, with the factual statements therein incorporated into the Court's findings of fact
16 in this Order, and the Court finds that Plaintiff is to recover damages, pre-judgment
17 interest, costs and attorneys' fees as follows:
18

19 Principal Judgment Amount:	\$106,606.85
20 Pre-Judgment interest at 12% through 2/6/2017	\$10,246.00
21 Pre-Judgment interest at 15% from 2/7/2017 to 1/9/2018	\$14,720.51
22 Costs	\$581.00
23 Attorneys' Fees	\$19,250.00

24 6. Total judgment based on the above is to be awarded to Plaintiff., against all
25 Defendants, jointly and severally, in the amount of \$151,404.36 with post-judgment
26 interest accruing at the rate of 15% per annum.
27

28 7. The Defendants waive all jurisdictional defenses or objections.
29

30 8. The parties, by and through their counsel, have agreed that entry of this
31 Order fully and finally resolves all issues between them arising from or related to the
32

1 claims in this action for all time periods up to the date of entry of this Order and precludes
2 further litigation between them on the resolved issues except for purposes of enforcing or
3 collecting on the Stipulated Judgment and the terms of the Settlement Agreement.

4
5 9. The Stipulated Judgment shall be entered as executed by the parties and
6 their counsel.

7
8 10. The parties waive all rights to appeal or otherwise challenge or contest the
9 validity of this Order.

10 11. All claims, cross claims, counterclaims of the parties, if any remain, are
11 hereby dismissed with prejudice and the case is dismissed without further award of fees or
12 costs to any party except as otherwise provided herein, in the Stipulated Judgment or
13 otherwise in the Settlement Agreement.

14
15 12. Notwithstanding the foregoing, the Court retains jurisdiction of this matter
16 for purposes of construction, modification (if stipulated by all parties), and enforcement of
17 this Order, inclusive of the terms of the Settlement Agreement.

18
19 SO ORDERED, this 5th day of February, 2018.

20
21
22 

23
24 UNITED STATES DISTRICT COURT JUDGE

25 ///
26 //
27 /

SO STIPULATED AND AGREED:

DATED January 12, 2018.

DATED January 12, 2018.

Counsel for Plaintiff James Willett

Counsel for Defendant Velocity On-Site, LLC

BATES & ELY, PLLC

COOK & BARTLETT, PLLC

/s/

/s/

Wesley D. Bates, WSBA No. 26273

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DATED January 9th, 2018.

Defendant Ramsey

Charles Ramsey, aka Charles R. Ramsey II

Individually

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PROPOSED STIPULATED ORDER GRANTING
STIPULATED MOTION TO ADD ADDITIONAL PARTY
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